

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

Michael J. Elli,	)	
Plaintiff,	)	
v.	)	No. 4:13-cv- 711 HEA
City of Ellisville, Missouri, et al.,	)	
Defendants.	)	

**PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to FED. R. CIV. P. 65(a) and for the reasons set forth in the accompanying Memorandum in Support, Plaintiff moves for a preliminary injunction prohibiting Defendant City of Ellisville, Missouri, its agents, servants, employees, and attorneys from seizing, citing, or prosecuting any individual within the City of Ellisville for communicating by flashing his or her headlamps.

Respectfully submitted,

/s/ Anthony E. Rothert  
ANTHONY E. ROTHERT, #44827  
GRANT R. DOTY, #60788  
AMERICAN CIVIL LIBERTIES UNION OF  
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ATTORNEYS FOR PLAINTIFF

Certificate of Service

I certify that a copy of the foregoing was served upon defendants by placing the same in the First Class mail addressed as set forth below on April 19, 2013:

City of Ellisville  
c/o Kate Demeter, City Clerk  
Ellisville City Hall  
1 Weis Avenue  
Ellisville, Missouri 63011

/s/ Anthony E. Rothert